



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105**

March 2, 2018

Derek J. Robinson, BRAC Environmental Coordinator  
Department of the Navy  
Base Realignment and Closure Program Management Office West  
33000 Nixie Way, Building 50  
San Diego, CA 92147

Re: EPA Comments on the Draft Remedial Action Completion Report Remedial Action in  
Parcel D-1 (Excluding Phase II Durable Cover), Hunters Point Naval Shipyard, San  
Francisco, California, January 16, 2017

Dear Mr. Robinson:

Attached are EPA's comments on Draft Remedial Action Completion Report Remedial Action in  
Parcel D-1 (Excluding Phase II Durable Cover), Hunters Point Naval Shipyard, San Francisco,  
California, dated January 16, 2017.

If you have any questions, please do not hesitate to call me at (415) 972-3681 or e-mail me at  
huang.judy@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Judy C. Huang". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Judy C. Huang, P.E.  
Remedial Project Manager

cc:

Nina Bacey, DTSC (via email)  
Jeff White, RWQCB (via email)  
David Tanouye, RWQCB (via email)  
Amy Brownell, SFDPH (via email)  
Leslie Howard, US Navy (via email)  
Danielle Janda, US Navy (via email)

**Review of the Draft Remedial Action Completion Report,  
Remedial Action in Parcel D-1 (Excluding Phase II Durable Cover),  
Hunters Point Naval Shipyard, San Francisco, California, January 2018**

**GENERAL COMMENTS**

1. Section 5.0 (Ongoing Activities) does not discuss and/or reference the operation and maintenance (O&M) of the permanent fence and entry gate along Berth 15 of the Gun Mole Pier. Similarly, Section 7.0 (Certification Statement) indicates that the soil remedial action objective (RAO) was met for Parcel D-1 Phase I by the installation and maintenance of a durable over with no discussion of the permanent fence and entry gate. As a result, it is unclear if the soil RAO of preventing exposure to polycyclic aromatic hydrocarbons (PAHs) and metals in surface and subsurface soil by industrial workers and constructions workers at concentrations above remedial goals (RGs) has been and will continue to be met. Section 3.9.1 (Seawall Stabilization) and Field Work Variance 005 in Appendix A (Submittals) indicate that along Berth 15 of the Gun Mole Pier the durable cover was installed to the edge of the gabion baskets/interior sheet pile wall rather than the outer seawall and a permanent fence and an entry gate were installed surrounding the area beyond the gabion baskets/interior sheet pile to prevent access/exposure [see Photograph 92 in Appendix E (Photograph Log)]. Similarly, it is unclear whether the permanent fence and entry gate will be maintained following transfer, as Section 5.2 (Land Use Controls) indicates that fencing and signs are not requirements of the record of decision (ROD) and may not be necessary after the site is transferred and redeveloped. Please revise the Draft Remedial Action Completion Report, Remedial Action in Parcel D-1 (Excluding Phase II Durable Cover), Hunters Point Naval Shipyard, San Francisco, California, January 2018 (the RACR) to discuss and/or reference the O&M of the permanent fence and entry gate along Berth 15 of the Gun Mole Pier to ensure the soil RAO of preventing exposure to PAHs and metals in surface and subsurface soil by industrial workers and constructions workers at concentrations above RGs is met.
2. Section 3.7 (Air Monitoring) states, “None of the construction activities exceeded the established threshold limit values at any time during project execution;” however, Attachment 1 (Air Sampling Results) of Appendix D (Air Monitoring Results) indicates that several samples were not collected due to inclement conditions or the project site being closed for holidays. As such, it is unclear if the statement in Section 3.7 is accurate given these potential data gaps. Please revise Section 3.7 and Appendix D (Air Monitoring Results) to discuss the lack of air sampling during inclement conditions and holidays as potential data gaps.
3. Issues associated with the air monitoring are not noted in the main text or Section 5.0 (Air Monitoring Results) of Appendix D (Air Monitoring Results). For example, Table 4 (Asbestos Monitoring Results) of Attachment 1 (Air Sampling Results) of Appendix D (Air Monitoring Results) indicates that the air samples collected on 06/09/2016 (Downwind – 22) and 11/07/2016 (Downwind – 22) were reported by the laboratory to be “Overloaded” and a sample results was not reported; however, the RACR does not discuss these samples or clarify the meaning of “overloaded.” Similarly, Table 4 of

Attachment 1 of Appendix D indicates that the sample filter on the air sample collected on 08/29/2016 (Upwind – 17) was reported by the laboratory to be “Damaged” and a sample result was not reported; however, the RACR does not discuss this sample or a potential cause of the damaged sample. Please revise the RACR to expand the discussions of issues encountered during the air monitoring.

4. Section 3.9.2 (Existing Surface with No Asphalt) states, “Import fill met all geotechnical, chemical, and radiological requirements as specified in FWV [Field Work Variance] 001 (Appendix A). Chemical, radiological, and geotechnical testing results of import fill are included in Appendix G;” however, geotechnical testing results of the import fill are provided in Appendix H (Geotechnical Data) not Appendix G (Import Sampling Results and Data Validation). In addition, Appendix G notes that “for some semivolatile organic compounds (SVOCs), the laboratory detection limits were above the comparison criteria” and that “because this material is from a borrow source is [*sic*] located in a nonindustrial area and is not a site undergoing an environmental cleanup, it can be reasonably concluded these SVOCs are not present in the material” yet the main text does not discuss this issue or assumption. Please revise the RACR to reference Appendix H for the geotechnical testing results of the import fill. In addition, please revise the main text to discuss the SVOC laboratory detection limits that exceeded the comparison criteria and the assumption that the SVOCs are not present in the backfill material.
5. A note on 07/22/16 BMP Inspection Form in Appendix C (Stormwater Management Paperwork) indicates that damaged sections of the turbidity curtain at Berth 19 required repair/replacement; however, the main text does not discuss this damage and/or repair. Please revise the RACR to discuss any issues encountered during the RA and how/when they were addressed and/or repaired.

## **SPECIFIC COMMENTS**

1. **Section 3.3, Utility Survey, Page 3-3:** Section 3.3 indicates that a geophysical survey was performed to identify any subsurface utilities that may exist at Parcel D-1; however, the text does not indicate if any subsurface utilities were identified or what action was taken if utilities were identified. It should be noted that Sections 3.9.2 (Existing Surface with No Asphalt) and 3.9.4 (Existing Building Foundations) indicate that concrete utility vaults were located on the South Pier and Gun Mole Pier. Please revise Section 3.3 to discuss the findings of the geophysical survey.
2. **Section 3.9.2, Existing Surface with No Asphalt, Page 3-7:** The text states that, “Site soils that did not meet the compaction requirements were reworked as needed;” however, the text does not discuss how the soils were reworked or if the soils were re-tested to ensure they meet the compaction requirements. Please revise Section 3.9.2 to discuss how the soils were reworked when they did not meet the compaction requirements and clarify if the soils were re-tested to ensure they met the compaction requirements.
3. **Section 3.9.4, Existing Building Foundations, Pages 3-8 to 3-9:** Based on Photographs 55 through 57 of Appendix E (Photograph Log), concrete forms were required for the repair of building foundations at former Building 308 and 384; however, Section 3.9.4

only indicates that “The openings in the foundations of Buildings 306, 308, and 384 were covered with a concrete mix following the specifications in Section 03 30 00 of the DBR [Design Basis Report].” Similarly, Appendix F (Construction As-Builts) does not show the locations of these repairs. To ensure these repairs are adequately documented, please revise Section 3.9.4 to expand the discussion associated with the repairs at Buildings 308 and 384. In addition, please revise Appendix F to show the locations of these repairs.

4. **Figure 3, Construction Site Layout:** The existing monitoring wells, shown on Figure 3, are not labelled. As a result, the information presented on Table 1 (Monitoring Well Coordinates) cannot be correlated. While the monitoring wells are identified on Drawing C3 (Final Monitoring Wells and Gabion Repair Locations) of Appendix F (Construction As-Builts), please revise Figure 3 to label the existing monitoring wells.
5. **Appendix E, Photograph Log, Photographs 4 and 29:** It is unclear how the water, observed behind the seawall at Berth 15 was managed, characterized, and disposed. Based on Photograph 4 of Appendix E, water was observed behind the seawall at Berth 15 but was subsequently removed prior to the filling of gabion baskets with rock at Berth 15, as shown in Photograph 29. It should be noted that Appendix J (Waste Data and Waste Manifests) does not include waste data or waste manifests associated with the disposal of water at Berth 15. Please revise the RACR to provide information regarding the management, characterization, and disposal of water observed behind the seawall at Berth 15.

#### **MINOR COMMENT**

1. **Section 3.9.2, Existing Surface with No Asphalt, Page 3-6:** The third paragraph states, “Open utility vaults on the South Pier and Gum (*sic*) Mole Pier that could not be filled with import material were sealed prior to subgrade preparation;” however, “Gum Mole Pier” should be “Gun Mole Pier.” Please revise the RACR to ensure “Gun Mole Pier” is utilized.